

DEREK WATKINS
HILTON vs SIG SAUER

November 10, 2022
23

1 see it listed anywhere. Is it listed anywhere?

2 A. I failed to include it. It's my fault.

3 MS. DENNISON: Jeff, for the record he's
4 indicated that he listed the materials subpoenaed and produced
5 by the Bridge City Police Department. This was part of those
6 documents.

7 MR. BAGNELL: Right. I'm just saying it's not
8 listed in either of the review of case materials. That's all
9 I'm trying to establish.

10 Q. (BY MR. BAGNELL) Well, on that no question, Derek.
11 I saw the videos. Were you the person doing those videos that
12 were produced?

13 A. No.

14 Q. It didn't look like it. Do you know who that was?

15 A. No. I'm not that thin.

16 Q. Someone at Sig Sauer?

17 A. Yeah, it was Tyler.

18 Q. What's his name?

19 A. I think his name is Tyler.

20 Q. Okay. Did you do any videos yourself above and
21 beyond what Tyler did?

22 A. Of myself?

23 Q. No. Of the incident and trying to recreate the
24 incident.

25 A. No, no, no. I didn't do any more videos. The videos

DEREK WATKINS
HILTON vs SIG SAUER

November 10, 2022
24

1 I performed myself were what was done at North Star.

2 Q. Okay. Was there any attempt to recreate the actual
3 incident, in terms of putting a holstered P320 in a purse with
4 other objects in it at any time?

5 A. No. I wasn't part of any if there were.

6 Q. All right. And last question I have for you, Derek.
7 In your first report, you don't really make a conclusion as to
8 what happened other than to say that Miss Hilton violated the
9 rules of gun safety, muzzle control. Do you recall that?

10 A. Muzzle control and causing the trigger to be
11 actuated.

12 Q. Right. And your second report you get a little bit
13 more specific, and you say it was either the mask cord or the
14 USB charging cable; is that right?

15 MS. DENNISON: Objection to form.

16 THE WITNESS: That is false. That's not what I
17 said. I said that those two objects have been proven to be
18 capable of pulling the trigger, but I did not limit it to those
19 two objects as to what happened, no.

20 Q. (BY MR. BAGNELL) All right. Well, what do you think
21 pulled Miss Hilton's trigger?

22 A. We don't have enough information to lock it down to
23 any one thing because there was no witnesses other than Mrs.
24 Hilton, who didn't see the gun actually discharge, according to
25 her testimony. So the thing is is we don't have enough

DEREK WATKINS
HILTON vs SIG SAUER

November 10, 2022
25

1 information.

2 (Interruption.)

3 Q. (BY MR. BAGNELL) All right. Derek, I think when
4 this cut off, you were in the process of saying something that
5 there's not enough information. Can you just complete your
6 response to the best of your ability.

7 A. Can you repeat the question? I'm sorry.

8 MR. BAGNELL: Alyssa, can you read it back the
9 last one?

10 THE REPORTER: Yeah. Question: "All right.
11 Well, what do you think pulled Miss Hilton's trigger?"

12 THE WITNESS: So given that we don't have the
13 witnesses of the incident, nobody saw the gun discharge, the --
14 all the physical evidence, all the testing of the pistol, all
15 the conditions of its components and its assembly, has shown
16 that the gun will not discharge absent trigger pull. So what
17 we can say with a reasonable degree of engineering and
18 scientific certainty is that the trigger was pulled. By what
19 object it was pulled or the condition of the pistol at the
20 time, meaning was it fully seated in the holster, not fully
21 seated in the holster and everything, we don't have any way of
22 answering what actually pulled. Now, we do know that you can
23 pull the trigger by the USB cable that's in the purse. We do
24 know that you can pull it by looping something around the
25 trigger and pulling on it. So those are options, but I